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*By email and mail*  
August 4, 2008

Phil Isenberg, Chair  
Delta Vision Blue Ribbon Task Force  
c/o California Bay-Delta Authority  
650 Capitol Mall, 5th floor  
Sacramento, CA 95814

RE: DELTA VISION STRATEGIC PLAN – SECOND STAFF DRAFT, JULY 11, 2008

Dear Chairman Isenberg and Members of the Delta Vision Blue Ribbon Task Force:

Ducks Unlimited, Inc. (DU), appreciates the opportunity to provide comments on the draft Delta Vision Strategic Plan. Ducks Unlimited representatives served on the Delta Vision Stakeholder Coordination Group and appreciate the attention of the members of the Task Force to the recommendations of the Coordination Group. We also have had a representative serving on the Bay-Delta Public Advisory Committee since its inception, and in light of the inability of the Bay-Delta Authority or Cal-Fed to make breakthrough progress in many areas of Delta management and restoration (although many significant projects were implemented, especially in the Delta's watersheds), we see the Delta Vision Strategic Plan as a major step forward in establishing a baseline for ecosystem restoration. In particular, we welcome the "ecosystem" approach prescribed by the plan. While other Delta planning efforts may often refer to the term "ecosystem," we find focus in those other efforts may be on only a few species, such as listed species. We appreciate the Task Force members' understanding that the Delta is affected to a large degree by what happens upstream and that the Delta can not be "fixed" while ignoring the Sacramento-San Joaquin watersheds.

Ducks Unlimited is an international waterfowl and wetland habitat conservation organization with over one million members, supporters, and volunteers in the United States. The mission of DU is to conserve, restore, and manage wetlands and associated habitats for North America's waterfowl and wildlife. As such we are limiting detailed comments on the draft to impacts on waterfowl, waterbirds and the habitats that support these important Delta species.

The Delta provides critical winter habitat for migratory waterfowl and shorebirds, supporting as many as 1.5 million ducks and geese, including several species in decline or of a special nature. The area is an important link in the Pacific Flyway.

About 95% of California's wetlands have been lost, making remaining wetlands and any restoration efforts vital to the survival of waterfowl. Of particular note, given the timing of waterfowl migration and the cycle of rainfall in the Central Valley, early migrating birds may find the Delta among the few places having water in the early fall, making the area particularly important to the majority of Pacific Flyway waterfowl and other birds that require access to water when they arrive.

Working in collaboration with private landowners, other nongovernmental organizations, and state and federal agencies in the Delta, DU has completed 46 wetlands restoration and protection projects for a conservation investment of over \$9.5 million. These projects span about 20,000 acres in the Delta, with the most extensive work at the Cosumnes River Preserve, Stone Lakes National Wildlife Refuge and the Isenberg Crane Preserve. Considerable additional work has been done by others, including the development of extensive managed wetlands in the Suisun Marsh specifically developed to support wintering waterfowl. In fact, waterfowl habitat in the Delta, including wildlife-friendly agriculture, is a wildlife management success story in progress, and we see many of the strategies of the draft Delta Vision Strategic Plan furthering these efforts if undertaken in a fashion that builds upon earlier habitat and waterfowl management enhancements. But more to the point, state and federal agencies responsible for waterfowl, and nongovernmental organizations, like DU, have cooperated effectively in the Delta to develop conservation and management plans (Central Valley Joint Venture, 2006. Central Valley Joint Venture Implementation Plan – Conserving Bird Habitat. U.S. Fish and Wildlife Service, Sacramento, CA.<sup>1</sup>) and have cooperatively funded wetlands restorations. These efforts have been underway concurrent to the less successful efforts by these very same government agencies to develop effective restoration plans for fish.

Because of the importance of the Delta to wintering waterfowl and waterbirds, and because of the work already done to improve habitat, it is important that the draft recognize both the importance of the waterfowl resources supported by the Delta and the need to maintain progress in developing wetlands habitat and support wildlife friendly agriculture in the Delta.

There is no gain to reinventing a Delta ecosystem focused on supporting several listed fish at the expense of other species, such as waterfowl. A worst case sce-

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<sup>1</sup> Central Valley Joint Venture Management Board Members: California Department of Fish and Game, California Department of Water Resources, California Resources Agency, California State Parks, California Wildlife Conservation Board, US Army Corps of Engineers, US Bureau of Land Management, US Bureau of Reclamation, US Environmental Protection Agency, US Fish and Wildlife Service, USDA Natural Resources Conservation Service, Audubon California, California Association of Resource Conservation Districts, California Waterfowl Association, Defenders of Wildlife, Ducks Unlimited, Point Reyes Bird Observatory Conservation Science, River Partners, The Nature Conservancy, Trust for Public Land

nario would be to replace one endangered native or migratory species for another, by creating a hospitable environment for one while making the environment inhospitable for the other.

We believe there is reason for concern. For example, over 50% of the world's population of Aleutian Canada goose use the Delta during wintering. This species was only recently removed from the endangered species list<sup>2</sup>. One of the performance targets recommended earlier through the Delta Vision Stakeholder Coordination Group focused on the Aleutian Canada goose, but this performance target was not included in the current draft.

Following are specific comments on the draft's text:

Page 8: Under Group 4: Species, add: Aleutian Canada goose percentage of the world's population sustained during winter residence – 50%

Page 29, Line 9: "...birds of the Pacific Flyway, passed through the Delta on their migrations between far flung habitats, with many migrating birds also wintering in the Delta, making it a critical link in the life cycle of millions of birds annually.

Page 29, Line 16: "...factors have caused both a long-term gradual decline in ecosystem health, changes in species composition, and a sudden..."

Page 29, Line 29: "...Viable populations of native resident and migratory fish and wildlife species;

Page 30, Line 19: "...productivity and for the rearing and feeding of many native fish and migratory birds. So too are seasonal..."

Page 30, Line 24: "...wetlands, upon which a wide variety of resident and migratory fish and wildlife species depend."

Page 31, Line 30: "...sites at appropriate elevation have large amounts of infrastructure, high-value and wildlife-friendly agriculture, structures in place to enhance migratory waterfowl or other issues

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<sup>2</sup> The Aleutian Canada goose had been thought extinct for several decades until a remnant population was discovered in 1962 on a remote Aleutian island. The species was placed on the Endangered Species List in 1966, when there were an estimated 800 individuals. Due to successful recovery efforts, the goose population rebounded to over 35,000 by 2002. The Aleutian Canada goose was officially delisted by the Fish and Wildlife Service in 2001. Unlike fish, waterfowl respond to food resources throughout the Delta watershed and are dynamic in distribution. As an example, 100% of the Aleutian Canada goose population currently may use the Delta for two to three months and then spend two to three months in the northern San Joaquin Valley, or fifty percent of the goose population may use the Delta for the entire wintering period.

related to land use and land ownership patterns, that make tidal marsh..."

Page 32, Line 16: "...fish and wildlife."

Page 33, Line 13: "...Several terrestrial species, migratory birds and natural communities use uplands and seasonal wetland..."

Page 33, Line 39: "...Large, open water areas with broad tidal connectivity to Delta waterways have the potential to provide pelagic habitats important for several fish species, diving ducks, such as canvasback and scaup, and to provide desirable and accessible food web productivity. Such areas also have the potential to be of little value to some desirable species and in fact detrimental to achieving the desired ecosystem characteristics for restoring smelt or salmonids if they become colonized by submerged aquatic vegetation and introduced predatory fish species. Although some species of submerged aquatic vegetation can be desirable for other important Delta species, such as diving ducks.

Note: Submerged aquatic vegetation can be very desirable for waterfowl, however the specific value to waterfowl varies and is dependent on depth and species of vegetation. In particular, species such as canvasback and scaup benefit from certain species of submerged aquatic vegetation. Both species are now exhibiting population trends that are of concern to waterfowl managers.

Thank you for this opportunity for DU to provide comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Rudolph A. Rosen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rudolph Rosen, Ph.D.  
Director